

**From:** [Briana Kottke](#)  
**To:** [rosetta.sannicolas](#) [REDACTED]  
**Subject:** Ricky Santos - Supplemental Discovery Request #1  
**Date:** Monday, October 19, 2020 11:17:00 AM

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Hi Rosetta,

I hope you are well and had a good weekend. Please consider this email my formal supplementary discovery request #1 in Ricky Santos's case CR 20-00092. In addition, I would like to schedule a time to review unredacted discovery at your convenience.

1. Handwritten notes of all officers/agents involved in this investigation;
2. Reports on clue spray analysis by law enforcement and all other missing documents relating to the arrest, questioning, and search of Mr. Santos's person and house;
3. *Brady, Giglio, and Henthorn* materials regarding but not limited to: David Elliott, Henry James, Jan Dizon, Jeremiah Cruz, Jason Correa, Shawn Ayuyu, Any U.S. Coast Guard Officers involved (see Bates 340), Willie Hays, Nicholas Wellin;
4. Any and all investigative reports resulting in the initial package being identified as "suspicious" and reports on related investigations. I am missing basically everything leading up to the day of the arrest and there may be exculpatory or mitigation evidence;
5. If a K9 was used on any packages relating to this investigation, I need the K-9's certifications, training and testing records, whether prey or play driven, the K9's "tells" or "alerts", and any other documents relating to the K-9 certifications or trainings;
6. Any and all surveillance videos or photos on Ricky or his family members and 302s relating to this investigation as they may contain exculpatory or mitigation evidence;
7. The lab results for DEA Exhibits 6-9, 12, and 14 as well as any other outstanding results not identified herein;
8. The "60-days letters" for DEA exhibits 13 and 7;
9. All missing chain of custody information relating to both drug and nondrug exhibits;
10. All licenses and necessary certifications on the Celebrite or other software used to image or review phones seized during investigation;

Thanks in advance,

~Briana

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**EXHIBIT B**

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